

July 14, 2021

By ECF

Honorable J. Paul Oetken
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

Re: ***United States v. Venkataram*, S1 06 Cr. 102**
Request to Adjourn Surrender Date by One Week

Dear Judge Oetken:

I write to request a one-week adjournment of Mr. Venkataram's surrender date so that the Court can receive the government's written response to our July 8, 2021 application, and decide the application, before Mr. Venkataram's surrender date. Mr. Venkataram's surrender date is July 19, 2021—the same date the government has requested as its due-date for a written response to our July 8 application. We request that the surrender date be extended to 2 p.m. on July 26, 2021.

On July 8, 2021, we requested that the Court convert Mr. Venkataram's prison sentence to home confinement in light of the anticipated conditions of his imprisonment. Prior to sending the letter, I conferred with the government, and noted their opposition to the request in my letter. The government today requested until July 19, 2021 to submit a response. Because July 19, 2021 is the surrender date, the government's requested schedule means that Mr. Venkataram will likely surrender before the Court has any opportunity to decide the application, or at the very least, that Mr. Venkataram will suffer the uncertainty of having no decision as he prepares to surrender. We do not oppose the government's request for time to respond (and the Court has already indicated that the proposed schedule is acceptable), we only request a corresponding one-week adjournment of the surrender date to permit the application to be decided, and if it is decided against Mr. Venkataram, to give him

a couple of days after that decision to prepare for his surrender. Accordingly, we request that the surrender date be extended to 2 p.m. on July 26, 2021.

I today conferred with the government to seek its consent to this request; the government declined to consent.

Respectfully submitted,



Justin S. Weddle

Granted. Defendant's surrender date is hereby extended to July 26, 2021, at 2:00 pm.

So ordered.

Dated July 15, 2021



J. PAUL OETKEN
United States District Judge